

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	08CR888
)	
ROD BLAGOJEVICH)	Judge James B. Zagel
)	

REQUEST TO FILE POST-TRIAL MOTION
IN EXCESS OF FIFTEEN PAGES

NOW COMES Rod Blagojevich, by and through his counsel, and hereby requests that this Court permit Blagojevich to file his post-trial motion in excess of fifteen pages. In support, Blagojevich states as follows:

Defense counsel has conferred with the government about the instant request and the government informed defense counsel that it did not have any objection.

Blagojevich was convicted of 17 counts after a second trial on 20 counts at which numerous issues arose which must be presented in Blagojevich's post-trial motion.

Defense counsel has attempted to be concise. However, because of the length of the trial and the complexity of this case, defense counsel cannot provide an adequate defense under the Fifth and Sixth Amendments to the Constitution in presenting a post-trial motion under fifteen pages.

WHEREFORE, counsel for Blagojevich seeks leave to file Blagojevich's post-trial motion in excess of fifteen pages.

Respectfully Submitted,
/s/ Lauren Kaeseberg
One of the Attorneys for
Rod Blagojevich

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